



Proof of Evidence – Justin Griffiths

Proposed Refurbishment, Extension &

Alterations to Existing Non-Food Retail Unit,

Sturlas Way, Waltham Cross

ON BEHALF OF ALDI STORES LIMITED - CHELMSFORD

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1.0 Introduction

- 1.1 This Proof of Evidence (PoE) has been prepared by Justin Griffiths BA Hons, Dip Arch, ARB, RIBA Senior Associate Architect responsible for the Planning Department at The Harris Partnership's (THP) Milton Keynes office on behalf of Aldi Stores Ltd Chelmsford (Aldi).
- 1.2 This PoE focuses on Design issues raised in (a) the LPA Decision Notice of Refusal dated 9th August 2021; (b) Highway officer comments raised at meetings on 09.05.22 & 17.05.22
- 1.3 I hold a BA (Hons) (RIBA Part 1) degree in Architecture, Dip Arch (RIBA Part 2) in Architecture and a Dip Arch (RIBA Part 3) in Professional Architectural Studies. I am a registered member of the Architects Registration Board and a Chartered Member of the Royal Institute of British Architects.
- 1.4 Overall, I have over 30 years experience working in the construction industry across a variety of sectors including residential, commercial, educational, and mixed use in new build and refurbishment projects. I also hold the position of Chair of Roxton Parish Council in rural north Bedfordshire with responsibility for assessing planning applications.
- 1.5 My involvement with this project has been from RIBA work stage 0 onwards, THP first started working on the redevelopment of this site in February 2018.
- 1.6 The evidence which I have prepared in this PoE is true, has been prepared in accordance with the guidance of my professional institution and I confirm that the

opinions expressed are my true professional opinions irrespective of by whom I am instructed.

- 1.7 Whilst I consider that the scheme as submitted is acceptable and should have been consented, nonetheless further dialogue with officers have identified potential improvements which the Appellant is content to promote at the appeal (please refer to fig 15. Accordingly, this PoE will also explain those proposed minor design enhancements that respond to the reason for refusal and comments made by the highway authority in their consultation response, which could be readily secured by condition should the Inspector consider them to be necessary fig 15.

2.0 Scope of Evidence

2.1 Relevant Documents

2.1.1 The documents referred to in this PoE include the following and which are included in the Core Documents.

- Decision Notice dated 9th August 2021 (CD 3.2)
- Arboricultural Assessment (CD 1.5)
- Substitute plan ref: 2924-COR-111F Proposed Site Plan (CD 4.3)
- Waltham Cross Town Centre Strategy (March 2015) (CD 7.1)
- Draft Waltham Cross Town Centre Planning Framework (May 2022) (CD 7.2)
- Manual for Streets (2007) (CD 8.10)
- Policy Documents DSC1 (CD 6.1)
- Policy Documents DSC2 (CD 6.1)
- Policy Documents DSC3 (CD 6.1)
- Policy Documents DSC8 (CD 6.1)

The following visual material will be used in this PoE and can be found in Appendix A:

- Fig 1 extract from existing site plan with dims
- Fig 2 extract from proposed site plan with dims
- Fig 3 photograph of existing access arrangement
- Fig 4a extract from existing site plan illustrating site levels
- Fig 4b extract from proposed site plan illustrating site levels
- Fig 5 photograph of existing eastern elevation
- Fig 6 photograph of existing northeast corner of the building taken just outside the site
- Fig 7 photograph of existing north elevation
- Fig 8 photograph of existing northeast corner of the site taken from the adjacent roundabout
- Fig 9 proposed CGI of the east elevation

- Fig 10 proposed CGI of the northeast corner of the building taken just outside the site
- Fig 11 proposed CGI of the north elevation
- Fig 12 proposed CGI of the northeast corner of the site taken from the adjacent roundabout
- Fig 13 sketch of alternative building subdivision
- Fig 14 sketch section through surface water storage tank
- Fig 15 further substitute plan number: 2924-COR-111J Proposed Site Plan
- Fig 16 further substitute plan number: 19094-SK220511.1 Swept Path Analysis
- Fig 17 plan number: 20695Y_06 Topographic Survey inc GPR data

2.1.2 This PoE focuses on 'design' issues raised in CD 3.2 and should be read in conjunction with the documents submitted on behalf of the appellant prepared by Avison Young (UK) Ltd, Connect Consultants Ltd and Noise Solutions Ltd.

2.1.3 Reason of refusal 2 covers 'design' and reads as follows:

"The proposal presents a layout that is not considered to integrate with the town centre and fails to enhance the character and appearance of the wider area. The proposal would not support the Council's aim of improving the connectivity of the northern High Street area with the rest of the town centre. The proposal is considered contrary to policies WC2, PM1, DSC1, DSC3, DSC7 and DSC8 of Broxbourne Local Plan 2018-2033 and the Waltham Cross Town Centre Strategy (2015)."

2.1.4 Policies WC2, PM1, DSC7 and the Waltham Cross Town Centre Strategy (2015) relate to matters covered in the PoE prepared by Avison Young and so are not covered in this PoE. This PoE will demonstrate how the refused proposals comply with policies DSC1, DSC3 and DSC8 of Broxbourne Local Plan 2018-2033.

3.0 Response to Reason for Refusal 2

3.1 There are two distinct design points raised in RR#2; namely integration with the town centre and the effect of the development upon the character & appearance of the area; this PoE will look at both in turn.

3.2 Integration with the town centre

3.2.1 The definition of the appeal site as within a town centre site is not a matter of disagreement in this case. Therefore, by virtue of its very existence the site and in turn the proposals are integral to the town centre. The extent to which the proposals enhance integration between the site and other parts of the town centre must therefore be what is in debate.

3.2.2 In order to determine whether the proposals represent an enhancement one must first determine the existing level of integration. The existing vehicular access is 13.1m at its narrowest point (fig 1), whilst the proposed access is 10m at its narrowest point (fig 2). This improves pedestrian access by reducing the length of roadway pedestrians need to cross between footpaths from 17.1m to 14.8m (fig 1 & 2).

3.2.3 Upon entering the site by vehicle at present visitors are presented with three lanes, the definition of these lanes is not immediately clear thus causing potential confusion due to the want of legibility (fig 3). In addition, safe and obvious pedestrian routes are not provided. The refused proposals resolve this problem by narrowing the access width to provide a conventional junction (one way in, one way out) (fig 2). In summary the proposals enhance level of integration of the appeal site with the rest of the town centre by providing a clearer and safer arrangement for visitors than currently exist.

3.2.4 The existing pedestrian access into the site from the public highway was retained on

the refused proposals. Therefore, the level of integration with the town centre was unchanged at the time of determination.

3.2.5 Since determination a substitute plan (CD 4.3) has been accepted by the LPA and the inspector. This plan illustrates an enhanced pedestrian and cyclist access that widened the existing public highway from 2m to 3m, facilitating access by both pedestrians and cyclists, a feature not available on the existing site (fig 4a & 4b).

3.2.6 Before exploring existing pedestrian routes further it is worth noting the volume of customers accessing a DIY store or food store on foot or bicycle. Presently it is accepted the majority of visitors to such stores would come by car, even if their intention is also to make a linked trip with other stores in the town centre. This fact requires designers to balance the needs of the majority while encouraging the take up of sustainable modes of travel.

3.2.7 Furthermore it is worth noting the status of a visitor using the pedestrian access point(s) is no different to any other visitor going from their car to the store entrance(s) from anywhere else in this car park or any other car park.

3.2.8 The new pedestrian access presents a significant enhancement to integration with the town centre compared to the existing position in a number of ways; the existing access is 2m wide while the proposed is 3m wide (fig 4a & 4b). 2m is insufficient for pedestrians and cyclists to pass; therefore, the provision of a 3m wide access will encourage more pedestrian and cyclists to access the site, a key component of CD 7.1 (Section 4 'An Accessible Town Centre) and of CD 8.10 (Manual for Streets).

3.2.9 The existing access ramps up at 1:10 to the carpark level (fig 4a) while the new access is flat and level offering visitors with mobility issues improved access (fig 4b). Table 1 of

Part M2 of the building regulations defines the maximum gradient of such ramps at 1:12. All of which if permitted will represent an enhancement of integration with the town centre thus achieving the key objectives of policy DSC1.

3.2.10 The policy objectives of para (a) of policy DSC1 are dealt with in section 3.3 of this PoE. The policy objectives of para (b) of policy DSC1 are dealt with in section 3.4 of this PoE. The policy objectives of para (g) of policy DSC1 are dealt with in section 3.3.10 of this PoE.

3.2.11 The policy objectives of para's (d), (i) and (j) of policy DSC1 do not appear to be of significant relevance in this case nor have they been cited in the LPA's SoC so have not been addressed in this PoE.

3.2.12 Para (c) of policy DSC1 seeks to increase permeability; the provision of an enhanced pedestrian and cyclists' access as illustrated on CD 4.3 achieves this policy objective.

3.2.13 Para (e) of policy DSC1 seeks to promote pedestrian friendly environments and active lifestyles; as illustrated on CD 4.3 the provision of an enhanced access at 3m wide, and the omission of three parking spaces creating a dedicated and legible pedestrian & cyclist route through the site as well as the provision of additional staff cycle spaces all contributes to achieving this policy objective. (CD 4.3). This will be enhanced by appropriate signage which can be secured by condition.

3.2.14 Para (f) of policy DSC1 seeks to provide coherent and logical layouts with active frontage as noted is para 3.2.14 to 3.2.21 of this PoE the layout is logical. Furthermore, the addition of food retail alongside DIY retail will significantly increase activity within the north/northwestern end of the town centre, by providing for the opportunity for convenience retail shopping while retaining the DIY offer thus achieving this policy

objective. Aldi's expected sales figures for the store are £300k per week; assuming average spend of £20.00-25.00 per customer equates to circa 12,000-15,000 customers a week. The Homebase currently has an average of 3,000 transactions per week which are expected to increase with the benefit of linked trips from Aldi customers.

3.2.15 Key to the LPA case would appear to be how the location of the customer entrance/exit points on the northern side of the building fails to provide active frontage along Sturlas Way. Before addressing the proposals, it is worth noting the Homebase store is the **only** active frontage along Sturlas Way; it is also worth noting the east and north elevations of the building are equally visible from the adjacent roundabout with Winston Churchill Way (fig 8). Therefore, the surrounding urban layout provides an opportunity to appreciate more of the building when viewed from this direction. While the eastern approach only offers one view of the building. The improved view of the building is illustrated in fig 12.

3.2.16 Coming back to the issue of active frontage; the existing store has an entrance feature which is partly glazed and only offers visitors a 7.3m wide view into the store while the refused scheme offers over 29m of new shopfront glazing significantly increasing the active frontage of the building. It is altogether a better designed and more interesting frontage than presently exists.

3.2.17 To understand why the customer entrance/exit points are located on the northern side of the building one must first go back to the base principles of the brief namely to downsize the existing Homebase allowing the introduction of a second retailer (Aldi).

3.2.18 The first step of this exercise is to establish the core requirements of both retailers. For Homebase their core requirements include a sales area of 1,858 sqm, a garden

centre/outdoor projects area accessed from the sales area, an employee welfare area, and a warehouse of 275sqm with direct access to an unfettered service yard. For Aldi they require a sales area of between 1254sqm to 1315sqm, an employee welfare area and a warehouse of 350sqm (minimum) with an unfettered loading bay. As stated early given the high proportion of customers who visit these types of stores by car alongside the sites town centre location the scheme requires around 150 shared customer parking spaces. For the record the refused proposals meet the requirements of both Aldi and Homebase.

3.2.19 It is worth noting achieving a certain square meterage of sale floor space is not the most important aim but rather how a given space is laid out with shelves and aisles. For example, a 5m wide by 300m long space while achieving 1500sqm would not be a viable retail space as it would only allow a single aisle with two rows of shelves on either side.

3.2.20 Drilling down into the detail, achieving a viable sales space is determined by the sum of two key components: shelves and aisles. This determines a certain amount of display space for products. If one cannot display enough product, then there is no store in the first place. For both retailers the typical shelves are 1.2m wide while aisles need to be a minimum of 2.4m (Aldi) and 2.8m (Homebase). If the customer entrances/exits were located on the eastern side of the building as would appear to be the LPA's preference this would provide viable retail spaces, but the warehouses would be 225sqm for Aldi and 145sqm for Homebase. Significantly lower than their minimum requirements refer to fig 13.

3.2.21 Locating the customer entrances/exits on the east forces the warehouses to be located on the western side of the building. After allowing for Homebases garden centre/outdoor projects area the service yard is 27.5m x 26.0m (fig 13). The typical

turning area for HGV's range between 24m and 26m. Which means there is simply not enough space available to extend the store to resolve the shortfall in warehouse areas, Aldi's loading ramp and two vehicles at any one time.

3.2.22 Without prejudice to the arguments made in section 3.2.1 to 3.2.21 above; at meetings with Hertford County Council Highway Department on 09.05.22 and 17.05.22, HCC requested several design changes to further enhance the integration of the scheme with the town centre. These changes are illustrated on fig 15 and outlined in para 4.2 of this PoE.

3.3 Character and Appearance

3.3.1 Para (a) of policy DSC1 seek to ensure developments "*enhance local character and distinctiveness, taking into account: existing patterns of development; significant views; urban form; building typology and details; height; roof form; fenestration detail; materials; building lines and other setbacks; trees; landscaping; and features of local and historic significance*" (CD 6.1)

3.3.2 With respect to character and distinctiveness (appearance); in order to determine whether a proposal achieves this aim one must first assess the existing character of the building and its setting. This is most readily done by observation and then comparison of existing versus proposed. To this end we draw attention to figures 5, 6 & 7. It is self-evident from these photographs the existing building and site is tired, outdated and in need of significant investment to refresh its character and appearance. Rather than a redevelopment – what is proposed is to reuse the existing building while upgrading its interior and its external appearance. This is a sensible strategy in sustainability terms which minimizes the loss of embedded carbon in the existing built form, whilst addressing other

planning objectives. It also allows continuity of trade during the construction phase ensuring the public continue to have access to the Homebase store.

3.3.3 In contrast to the existing building and with reference to figures 9, 10, & 11, through the addition of white render, redecorated high level cladding, new shopfront glazing, new canopy as well as the external hard/soft landscape improvements it is self-evident the refused proposals represent a significant enhancement to the character and appearance of the building and the wider site in line with the objective of para (a) of policy DSC1.

3.3.4 The above fact was supported by the LPA in their committee report para 8.14 which acknowledges the *"...design modifications proposed represent an improvement..."*.

3.3.5 With respect to *"...existing patterns of development; urban form; building typology and details; height; roof form; building lines and setbacks; features of local and historic significance..."* none of these matters are affected by the proposals, therefore no comment is made in this PoE on these matters.

3.3.6 With respect to *"...significant views..."*, the LPA have not specified which direction such view(s) should be considered for this site. Our analysis of the various approaches to the site determined the adjoining roundabout is of significant importance as the majority of visitors to a DIY store and food store will be by car. Figures 6 (the view on foot) & 8 (the view by car) illustrate the current view visitors have of the site from this direction. Figures 10 (the view on foot) & 12 (the view by car) illustrate the proposed views. When the existing views either on foot or by car and the proposed views are compared it is evident the proposed scheme represents an enhancement to the significant views in line with the para (a) of

policy DSC1.

- 3.3.7 With respect to "...*fenestration detail & materials...*" a dominant feature of the existing building is the expressed brick piers aligned with the buildings structural frame with brick paneling between the piers. The refused proposals sought to enhance the expression of these piers by rendering the brick panels while cleaning the retained brick piers. This would offer greater clarity of the buildings structural makeup and add to the pallet of materials for the viewer, thus enhancing the detailing of the building in line with para (a) of policy DSC1. The white render also provides a contrast to the new shopfront glazing thus ensuring visitors clearly understand where the entrances are located.
- 3.3.8 While white render is not used in the 20th Century buildings along High Street north or south it is evident in older buildings, the use of render acknowledges the more historic use of render on commercial/retail buildings. (For example, The Vine public house directly opposite the site and the Fish Pool retail building.) The white render will create a sharpness and cleanliness which will refresh and brighten what is currently a dark oppressive building. The other proposed materials would be unique to the area acknowledging how the building sits as a standalone property in the town centre in a gateway position.
- 3.3.9 With respect to "...*trees...*"; this matter is discussed in para 3.4.1 below.
- 3.3.10 With respect to "...*landscaping...*"; the existing site has just one soft landscape bed located along the eastern boundary offering 130 sqm of planting. The refused proposal would increase the quantum of soft landscape area to 215sqm. Furthermore, the refused proposals sought to refresh the existing planting with replacement native species planting. In this way the refused scheme aligns with para (a) of policy DSC1.

3.3.11 Para (g) of policy DSC1 seeks to “...create local landmarks and marker features for a well-defined townscape.” As outlined in para 3.3.6 the view from the adjoining roundabout is a significant view and could be described as a gateway location for the town centre. In this sense the existing character and appearance of the building does little to act as a landmark or even a positive incidence in the townscape, in contrast the proposed scheme would create a positive addition and could act as a local landmark as illustrated on fig 10 & 12 in line with the aims of this policy.

3.4 Other relevant policy matters

3.4.1 Para (b) of policy DSC1 requires natural features to be dealt with sensitively and retained where possible. Unfortunately, as evidenced by the Arboricultural Assessment submitted in support of the application (para 3.3 of CD 1.5) the mature tree abutting the site is in poor condition and in risk of falling, therefore it would not be safe to retain it. The tree in question is located on Hertfordshire County Council (HCC) highway land abutting a retaining wall and public footpath. At the time of submission, the retaining wall and public footpath have been seriously damaged by the tree roots. As the refused scheme sought to widen the public footpath (into the application site) it was decided to include repairs works at the applicants' expenses to the retaining wall and footpath. The tree would be replaced by the above-described landscaping but would also be specifically replaced by a heavy stock specimen.

3.4.2 Para I of policy DSC2 seeks to ensure the character of existing buildings is respected. As mentioned in para 3.3.7 by retaining the existing brick piers and rendering the panels in-between, the proposal offers greater clarity of the buildings structural makeup thus respecting the existing character as required by this policy.

3.4.3 Para II of policy DSC2 relates to dwellings and so is not covered in this PoE.

- 3.4.4 Para (i) of policy DSC3 seeks to maximise legibility and permeability of the public realm. The proposals achieve this through the enhancement of vehicular access (refer to para 3.2.2) but more importantly through the enhancement of pedestrian access as outlined in para 3.2.4, 3.2.7, 3.2.8, 3.2.11 and 3.2.12.
- 3.4.5 Para (ii) of policy DSC3 seeks to "*maintain flexibility of use*", which the proposal does as none of the proposed works fundamentally alter the structure of the building or layout of the site.
- 3.4.6 Para (ii) of policy DSC3 also seeks "*uncluttered spaces and ease of movement through the use of public art, street furniture and infrastructure including signposting/way finding*". The ease of customer movement by car is enhanced as outlined in para 3.2.2 while the ease of customer movement by foot or bicycle is enhanced with the 3m wide level access denoted with surface changes as illustrated on CD 4.3.
- 3.4.7 Para (iii) of policy DSC3 seeks "*maximise urban greening and opportunities for climate change...*". This is achieved through the provision of an additional 85sqm of soft landscaped beds and the selection of native planting throughout.
- 3.4.8 Para (iv) of policy DSC3 seeks to "avoid left-over spaces", as evidenced on CD 4.3 no such spaces would be created by the proposals.
- 3.4.9 Para I of policy DSC8 relates to historic shopfronts which is not applicable in this case so is not covered in this PoE.
- 3.4.9 Para II of policy DSC8 relates to shopfronts in a street scene; as the building is a stand-alone structure and setback off Sturlas Way, this matter is not applicable to this case and

so is not covered in this PoE.

3.4.10 Para III of policy DSC8 relates to solid shutters again given the buildings isolation this matter is not applicable to this case and so is not covered in this PoE.

3.4.11 Para IV of policy DSC8 seeks to ensure "*shopfronts sit within existing building structure*" as the new shopfronts are located between the retained existing brick piers the proposals comply with this policy objective.

3.4.12 Para V(a) of policy DSC8 sets out the criteria by which new fascia's will be assessed. As demonstrated in fig 5, 6, & 7 the parent building has a coloured netting fitted to grey high-level fascia, upon closure examination the paintwork is peeling. The proposals include removal of the netting and the retention and redecoration of the existing fascia in anthracite (dark grey). The choice of colour ensures a continuity with other new features (i.e., shopfront and canopy). The proposed canopy seeks to address a shortfall of the existing building by providing shelter to customer exits and trolley bays.

3.4.13 Para V(b) of policy DSC8 relates to scenarios with two existing buildings which is not applicable in this case so is not covered in this PoE.

3.4.14 Para V(c) of policy DSC8 relates to size, scale and illumination of fasciae as the proposed fascia's will not be illuminated this is not applicable in this case so is not covered in this PoE.

3.4.15 Para V(d) of policy DSC8 relates to advertisements as advertisement was not cited in the Reason for Refusal this is not applicable in this case so is not covered in this PoE.

3.5 Other points of interest

3.5.1 During a meeting with HCC on 09.05.22 the officer tabled an example of a food store where the pedestrian route followed a straight line from the site entrance to the store entrance. HCC officer asked if the pedestrian route could follow a straight-line eastward from the northeast corner of the building to the site boundary. In reply, HCC were advised this was not possible due to the difference in ground levels at the eastern boundary with the public footpath. To make such a connection at this point a ramp would be required to make up the 0.4m level difference over 7.6m (fig 14) HCC were also made aware of the existence of utility provider surface water storage tank at this position see fig 17 It was explained to HCC there is insufficient ground cover to this tank or distance to construct a building regulation compliant ramp over the tank (fig 14).

4.0 Suggested Design Enhancements

4.1 During meetings with HCC in the May 2022 officers have identified further opportunities to further enhance the proposed design. Such enhancements are minor in detail but could have a positive impact on the overall scheme, and the Appellant is willing to deliver them should the appeal be allowed. They could be readily secured by condition.

4.2 The proposed changes are illustrated on fig 15 and can be summarised as follows:

- a) The internal layout of the parking bays has been changed to allow an alternative route for Aldi delivery vehicles fig 16.
- b) This alternative delivery route has facilitated a further reduction in the width of the proposed vehicular access onto Sturtas Way.
- c) In turn this further reduces the distance of roadway pedestrians, and cyclists need to use when crossing the vehicular access.
- d) The internal route for pedestrians and cyclists from the northern corner is to be demarked with coloured tarmac to aid clarity for customers from the town centre.
- e) The distinction of this route is further enforced with the introduction of a kerb edged defined soft landscape island.
- f) The pedestrian route through the car park from the retained access point is to be demarked with coloured tarmac to aid clarity for customers from the town centre.
- g) The pedestrian route around the building is to be denoted with coloured tarmac reinforcing the clarity of purpose for visitors by foot, bicycle etc.
- h) New way finding signs at the pedestrian/cyclist entrances points
- i) A further two passive EVCP's are to be provided (bringing the total to 18

passive EVCP's and 4 active EVCP's).

- j) A further three customer cycle hoops are to be provided (bringing the total to 24 customer cycle spaces).
- k) Soft landscape areas will increase from 130sqm to 215sqm.

4.3 Such amendments are not necessary, and the scheme as presented is in my view acceptable and represents good quality design. However, now that such feedback has been presented (albeit long after the application has been appealed), it is only appropriate that the Appellant has sought to respond to it, and if the scheme were to be allowed then it would be to the benefit of all parties for these improvements to be included in the final design.

5.0 Summary & Conclusion

5.1 Summary of Proof of Evidence: Introduction

5.1.1 This Proof of Evidence has been prepared by myself, Justin Griffiths I am an Associate at The Harris Partnership's Milton Keynes office with responsibility for all planning applications in the office. I hold a BA (Hons) (RIBA Part 1) degree in Architecture, Dip Arch (RIBA Part 2) in Architecture and a Dip Arch (RIBA Part 3) in Professional Architectural Studies. I am a registered member of the Architects Registration Board and a Chartered Member of the Royal Institute of British Architects.

5.1.2 Overall I have 30+ years of experience working in the construction industry across a variety of sectors including residential, commercial, educational and mixed use in both new build environments and conservation areas. I also hold the position of Chair of Roxton Parish Council in rural north Bedfordshire with responsibility for assessing planning applications.

5.1.3 My involvement with this project has been from RIBA work stage 0 onwards, THP first started working on the redevelopment of this site in February 2018 when the landlord approached Aldi.

5.2 Scope of Evidence

5.2.1 My evidence specifically relates RR#2 (design). I refer to CD 1.5, CD 3.2, CD 4.3, CD 7.1, CD 7.2 CD 8.10 and CD 6.1

5.2.2 My evidence includes several drawings and CGI's that illustrate how the proposed design complies with the requirements of the relevant planning policies

5.3 Relevant Policies

5.3.1 I confirm the relevant 'design' policies to which this PoE refers to are, DSC1, DSC2, DSC3, DSC8 of Broxbourne Local Plan 2018-2033.

5.4 Response to RR#2 in the context of policy DSC1 para a, b, c, e, f, and g:

5.4.1 My evidence analyses in detail reason for refusal in the context of the above paragraphs each time demonstrating how the refused scheme complied with these policies, through enhanced pedestrian and cyclist connectivity from the site to the town centre. My evidence also demonstrates how the agreed substitute plan CD 4.3 and if accepted by the inspector (fig 15) if approved provide an opportunity to further improve upon the development.

5.5 Response to RR#2 in the context of policy DSC2 para I:

5.5.1 My evidence analyses in detail reason for refusal in the context of the above demonstrating how the refused scheme complied with this policy, through the enhanced appearance on offer. A fact supported by officers in their report (see para 3.3.4 of this PoE).

5.6 Response to RR#2 in the context of policy DSC3 para (i), (ii), (iii) and (iv):

5.6.1 My evidence analyses in detail reason for refusal in the context of the above paragraphs demonstrating how the refused scheme complied with these policy objectives through improving access arrangements while also increasing extent of soft landscaped areas.

5.7 Response to RR#2 in the context of policy DSC8 para IV and V(a):

5.7.1 My evidence analyses in detail reason for refusal in the context of the above paragraphs demonstrating how the refused scheme complied with these policy objectives through the retention of existing building structure and through the respect given to the existing fascia's.

5.8 Response to HCC suggestions post determination:

5.8.1 My evidence outlines the suggestions made by HCC and demonstrates how these ideas could be implemented to the benefit of all parties for these improvements to be included in the final design.

5.9 Conclusion

5.9.1 In summary, my evidence outlines how the refused scheme met with the requirements of all relevant policies but also how the applicant has listened to comments made post determination and is willing to provide further enhancements requested by HCC.



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